

EXHIBIT “B”



— LAW OFFICES OF —
THOMAS A. BIZZARO, JR., P.C.

April 23, 2025

VIA EMAIL

Daniel E. Gorman, Esq.
J. Evan Gibbs, Esq.
Troutman Pepper Locke
875 Third Avenue
New York, New York 10022

**RE: SiteOne Landscape Supply, LLC v. Nicholas Giordano et al.
USDC/EDNY Docket No.: 2:23-cv-02084**

Dear Messrs. Gorman and Gibbs:

As you are aware, my firm, along with Milman Labuda Law Group, PLLC, represent the Defendants in the above-referenced matter. As you are further aware, pursuant to the last court order, SiteOne was directed to produce relevant email correspondence and text messages (and other relevant electronic information, if any) contained on the each of the custodian's cellular telephones.

In that regard and in order to facilitate the process, attached please find a "SiteOne Landscape Supply, LLC Custodian Questionnaire" (the "Questionnaire"). Kindly have each custodian complete the Questionnaire and kindly return the completed and signed forms to my attention no later than Friday, May 2, 2025.

Thank you for your anticipated cooperation.

Very truly yours,

A handwritten signature in black ink, appearing to be 'TAB', written over a horizontal line.

Thomas A. Bizzaro, Jr.

cc: Milman Labuda Law Group, PLLC
Farrell Fritz, P.C.

SITEONE LANDSCAPE SUPPLY LLC CUSTODIAN QUESTIONNAIRE

For each SiteOne Custodian, please have him/her provide the following information:

1. Personal Information and Cellular Phones:

- Custodian's Full legal name.
- Did the Custodian maintain both a business and personal cell phone (2 devices or more) since the commencement of the Federal Court lawsuit?
- Identify any and all cellular phone numbers the custodian currently owns and/or controls.
- Identify any and all phone numbers the custodian has owned and/or controlled since the inception of the Federal Court lawsuit.
- Identify the manufacturer and model of any and all cellular telephones owned, utilized and/or controlled since the inception of the Federal Court lawsuit.
- Did the Custodian own, utilize and/or control either a business or personal (or both) iPad and/or tablet or other electronic device capable of sending or receiving email communications and/or text messages.
- State whether the Custodian has upgraded and/or replaced any cell phone since the commencement of the Federal Court Action.
- State whether the Custodian made any change in cell phone service providers since the commencement of the Federal Court Action.
- State whether the Custodian has swapped and/or replaced SIM cards in any cell phone since the commencement of the Federal Court Action.

2. Email Accounts:

- Identify any and all email accounts the custodian presently maintains, owns and/or controls.
- Identify any and all email accounts the custodian has maintained, owned and/or controlled since the commencement of the Federal Court lawsuit.
- Identify the dates of email account creation and any significant changes (e.g., password changes, account recovery, etc.) since the commencement of the Federal Court Lawsuit.
- Identify any and all backup and/or recovery email accounts or aliases.
- Identify any and all email forwarding or filtering rules set up for any of the Custodian's email accounts.

3. Social Media Accounts:

- Provide a comprehensive list of any and all social media accounts owned, controlled and/or utilized by the Custodian since the commencement of the Federal Court Action, whether active or not, including, but not limited to, Facebook, Instagram, Twitter, LinkedIn, Snapchat, and TikTok.
- Identify any other platforms utilized by the Custodian (e.g., Reddit, Pinterest).
- Identify the usernames, handles and/or or profiles for each social media account.
- Provide the date(s) of each account creation and identify any and all significant changes made (e.g., privacy settings, username changes) since the commencement of the Federal Court Action.
- State whether the Custodian has deactivated and/or deleted any social media accounts and/or posts relevant to the case since the commencement of the Federal Court Action.

4. Messaging Applications:

- List of all messaging applications utilized by the Custodian including, but not limited to, WhatsApp, Facebook Messenger, Signal, Telegram, and/or iMessage.
- Identify any other relevant applications utilized by the Custodian (e.g., Viber, Zoom, Skype).
- Identify the usernames or phone numbers associated with these messaging applications.
- Provide the date(s) of account creation and any changes made since the commencement of the Federal Court Action.

5. Cloud Storage:

- Identify any and all cloud storage accounts used by the Custodian for communication or document sharing (e.g., iCloud, Google Drive, Dropbox, OneDrive).